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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
: Case No. 22-10964  
Celsius Network LLC, *et al.*<sup>1</sup>, :  
: Debtors. : (Jointly Administered)  
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**VÍCTOR UBIERNA DE LAS HERAS JOINDER TO OBJECTION FROM  
VERMONT (Docket 1040) TO THE DEBTORS' MOTION FOR AN  
ORDER APPROVING BID PROCEDURES AND FOR RELATED  
RELIEF**

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Víctor Ubierna de las Heras, pro se creditor, hereby joins in the objection filed by Vermont to the Debtors' motion for an order approving bid procedures and for related relief (Dkt. 929). Víctor Ubierna objects to the same and request that the court denies the motion. Specifically,

As stated:

<sup>1</sup>The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

"This Court has not yet determined whether or not and to what extent various classes of crypto assets—e.g., Stablecoin, "Custody" accounts, "Withhold" accounts-- held by the Debtors are property of the bankruptcy estate. The Examiner appointed by this Court has not yet issued her report regarding, *inter alia*, the status of various crypto assets. The Court has also not yet entered an Order on Debtors' Motion to Sell Stablecoin. The status of crypto assets withdrawn by insiders on the eve of the June 12 "freeze" has likewise not been determined. In short, it is premature for this Court to enter any order approving bid procedures until the scope of Debtors' assets is better understood."

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Dated October 13, 2022

/s/ Víctor Ubierna de las  
Heras

VICTOR UBIERNA DE LAS  
HERAS

Pro se Creditor